

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BRAVE BULK TRANSPORT LTD.,

07 Civ. 4546 (CM)

Plaintiff,

NOTICE OF MOTION

-against-

SPOT ON SHIPPING LTD., a.k.a. SPOT  
ON SHIPPING LTD. BVI, a.k.a. SPOT ON,  
a.k.a. CLAYTON STAR COMPANY LIMITED  
a.k.a. CLAYTON STAR and PHEW ASSET  
MANAGEMENT LIMITED a.k.a. PEHW ASSET  
MANAGEMENT LTD. and ZHANGGANG SHIPPING  
LIMITED,

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Declaration and the exhibits thereto attached, Memorandum of Law, and all the prior pleadings and proceedings in this action, defendant ZHANGGANG SHIPPING LIMITED (ZSL), subject to express restriction pursuant to Rule E(8) of the Supplemental Rules for Certain Admiralty and Maritime Claims, will move the Court before the Honorable Colleen McMahon at the Courthouse located at 500 Pearl Street, New York, New York, for an order, pursuant to Fed. R. Civ. Proc. E(4)(f), vacating, dissolving, and quashing the process of maritime attachment and garnishment issued pursuant to the Court's Amended Ex Parte Order dated July 9, 2007 and entered on July 10, 2007, and granting to ZSL such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York  
August 22, 2007

MAHONEY & KEANE, LLP  
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ZHANGGANG SHIPPING LIMITED

By: 

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